

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

ALFRED GARCIA,

Plaintiff,

vs.

No. 07-cv-782-JC-RLP

DISCOVER FINANCIAL SERVICES, LLC,  
EXPERIAN INFORMATION SOLUTIONS, INC.  
TRANS UNION, LLC and  
EQUIFAX INFORMATION SERVICES, LLC.

Defendants.

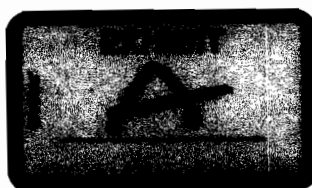
**AFFIDAVIT OF CHARLES PARNALL**

State of New Mexico )

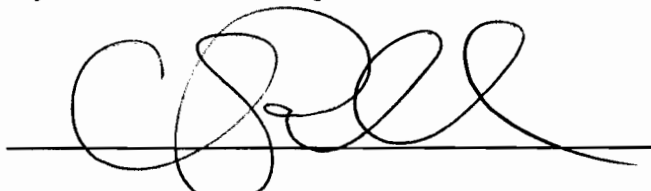
County of Bernalillo ) ss.

Being first duly sworn, affiant hereby deposes:

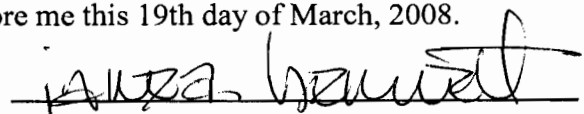
1. On March 5, 2008, I received a telephone message from Chase's subpoena department. I returned the telephone call and spoke with "Lolena" who informed me that the subpoena and Notice of 30(b)(6) Deposition had been provided to Chase's legal department.
2. On March 12, 2008, I telephoned Linda Lewis at Chase's legal department and left a telephone message regarding the identity and location of the deponent.
3. On March 14, 2008, I spoke with Aneta Povlovich at Chase's legal department regarding the documents requested, and the identity and location of the deponent. Ms. Povlovich stated that Chase would identify the deponent by Monday, March 17, 2008, at which time it would be able to provide the identity and location of the deponent. Ms. Povlovich also stated that Chase would provide documents on March 18, 2008.

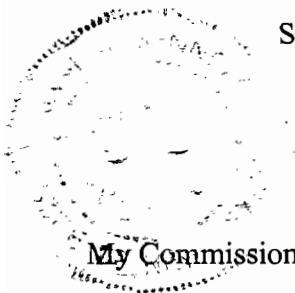


4. Chase did not provide the identity or location of the deponent on March 17, 2008.
5. On March 18, 2008, in the morning, I again spoke with Ms. Povlovich on the telephone. Ms. Povlovich stated that Chase had not yet identified the deponent, and was still attempting to locate the requested documents. Ms. Povlovich stated that she would telephone me later that day.
6. Later that day, I telephoned Ms. Povlovich and left a voice mail, requesting that she return my telephone call. Ms. Povlovich did not return the telephone call.
7. On March 19, 2008, I telephoned Ms. Povlovich and left a voice mail requesting the location and identity of the deponent.
8. Later that day, having received no response from Ms. Povlovich, I telephoned Ms. Lewis. Ms. Lewis was unable to provide the identity or location of the deponent. Ms. Lewis provided me with Ms. Povlovich's fax number. I faxed a letter to Ms. Povlovich requesting she contact me immediately with the identity and location of the deponent.
9. On March 19, 2008, in the afternoon, I received a telephone call from Ms. Povlovich. Ms. Povlovich refused to provide the identity or location of the deponent.

  
Charles Parnall

SUBSCRIBED and SWORN to before me this 19th day of March, 2008.

  
Notary Public



My Commission Expires:

06.16.10